REMARKS

Claims 1-9, 24-32, and 46-54 are pending. No claims have been amended, canceled, or added.

Amendments to the Specification

The amendments to the specification section corrects a typographical error in a paragraph on page 1, lines 13-20, by removing a period from the middle of the sentence.

35 USC §102(b) Rejections

Claims 1-9, 24-32, and 46-54, stand rejected under 35 USC §102(b) as being anticipated by U.S. patent application No. 6,766,320 to Wang et al. ("Wang"). These rejections are traversed.

A fundamental aspect of 35 USC §102(b) is that a claim is anticipated only if each and every element as set forth in the claim is described in a single prior art reference. (MPEP §2131.01). Wang does not describe each and every feature of claims 1-9, 24-32, and 46-54 for the following reasons.

Claim 1 recites "detecting user input", "analyzing the user input", "predicting desired access to one or more media files based on the analysis", "retrieving information corresponding to one or more media files from a media content source", and "presenting the information to a user for suggested access." In addressing these claimed features, the Office Action ("Action") asserts that Wang describes these features in col. 15, lines11-24. Applicant respectively disagrees. Let's take a look at the particular portion of Wang cited by the Action as anticipating claim 1.

Wang at col. 15, lines 11-24 explicitly describes:

> *"After the user inputs a natural language query, the search engine judges the user intention by using the core phrases. Because the intention extends beyond a simple question, the search engine predicts the user's intention from the current query and provides reasonable answers for confirmation. For example, in the above example, the real goal of the user is to get useful information about traveling to Shanghai. Thus, the sightseeing information about Shanghai is related to the user's intention. In response to the above query, the search results are two alternative answers related to the user's intention:[Chinese characters];. (The sightseeing routes from Beijing to Shanghai) [Chinese characters]. (The sightseeing sites in Shanghai)[.]"*

This cited paragraph of Wang explicitly describes that responsive to receipt of "a natural language query", a "search engine predicts the user's intention to "provide reasonable answers". Wang then provides an explicit example where the "reasonable answers" pertain to sightseeing routes from Beijing to Shanghai and sightseeing sites in Shanghai. Clearly, this description is completely silent with respect to any description of "retrieving information corresponding to one or more media files from a media content source", as claim 1 recites. "[A] "media content source", as claim 1 recites, stores "media content". Applicant's specification at page 7, lines 4 through 9, clearly describes that "media content" is multimedia, which includes content that can be rendered, such as video, audio, an image, and/or the like. Nowhere does Wang explicitly or inherently describe such "a media content source", as claim 1 recites.

Instead, the Abstract of Wang explicitly describes storing frequently asked questions (FAQs) in a database, use of natural language-based queries, fully-parsed results, and partially-parsed fragments. It is respectfully submitted that Wang's parsed results and fragments pertain to text or language that has been

divided into small components that can be analyzed. For example, parsing this sentence would involve dividing it into words and phrases and identifying the type of each component (e.g., verbs, nouns, keywords, etc.). The abstract of Wang also describes that a "question matcher then correlates the questions with a group of possible answers arranged in standard templates that represent possible solutions to the user query" (e.g., sightseeing routes associated with Shanghai). Wang describes that the search engine uses keywords to locate the possible answers by searching on any keywords returned from a parser. The answers returned from the question manager and the keyword search or are presented to the user". (Abstract). In view of the above, Wang describes use of text-based queries to return text-based results that are then matched to FAQs stored in database. Clearly, this description of Wang is completely silent with respect to any description of "retrieving information corresponding to one or more media files from a media content source", as claim 1 recites.

Accordingly, the 35 USC 102(b) rejection of claim 1 is improper and should be withdrawn.

Claims 2-9 depend from claim 1 and are not anticipated by Wang solely by virtue of this dependency. For this reason alone, the 35 USC 102(b) rejections of claims 2-9, as being anticipated by Wang, are improper and should be withdrawn.

Additionally, claims 2-9 include further features that are not anticipated by Wang.

For example, claim 4 recites "wherein the information further comprises suggested media content items", "detecting user interest in an item of the suggested media items", and "responsive to detecting the user interest, displaying a high-level feature corresponding to the item, the high-level feature being stored

in a database." In addressing these features, the Action asserts that they are described by Wang at col. 3, lines 15-45, and col. 12, lines 66-67. Applicant respectively disagrees.

Let's take a closer look at that portion of Wang asserted by the Action as describing the recited features of claim 4. Wang at col. 3, lines 15-45 recites:

> *"The search engine architecture logs the queries, the answers returned to the user, and the user's confirmation feedback in a log database. The search engine has a log analyzer to evaluate the log database and glean information that improves performance of the search engine over time. For instance, the search engine uses the log data to train the parser and the question matcher. As part of this training, the log analyzer is able to derive various weighting factors indicating how relevant a question is to a parsed concept returned from the parser, or how relevant a particular answer is to a particular question. These weighting factors help the search engine obtain results that are more likely to be what the user intended based on the user's query.*
>
> *In this manner, depending upon the intelligence provided in the query, the search engine's ability to identify relevant answers can be statistically measured in terms of a confidence rating. Generally, the confidence ratings of an accurate and precise search improve with the ability to parse the user query. Search results based on a fully-parsed output typically garner the highest confidence rating because the search engine uses essentially most of the information in the user query to discern the user's search intention."*

Nowhere does the above-cited portion explicitly or inherently describe that Wang's "queries", "confirmation feedback", "weighting factors", "particular answer", "relevant answers", "competence rating", "parsed output", or "search intention", is a "media content item", as Applicant claims. "[M]edia content" is not text, whereas the "high-level feature corresponding to the item" is text. It is respectfully submitted that since Wang merely describes use of text-based queries,

text parsing, and returning parsed results, Wang is completely silent with respect to any explicit or inherent description of "a high-level feature corresponding to the item", as claim 4 recites. For this reason alone, every element as set forth in claim 4 is not described by Wang.

Now, let's take a look at the other section of Wang that was cited by the Action as anticipating the features of claim 4. Wang at col. 12, lines 66-67 recites: "[a]s shown in answer table 708, every answer has two parts: a URL and a description." Nowhere does this cited portion explicitly or inherently describe that Wang's "URL" is a "media content item", as Applicant claims. This is likely because a URL is text, and not a "media content item". For this reason alone, this cited portion of Wang does not describe "detecting user interest in an item of the suggested media items", and "responsive to detecting the user interest, displaying a high-level feature corresponding to the item", as claim 4 recites.

For at least these additional reasons, Wang does not anticipate each and every element as set forth in claim 4. Accordingly, and for these additional reasons, the 35 USC 102(b) rejection of claim 4 should be withdrawn.

In another example, claim 9 recites "identifying media content use patterns, and wherein analyzing the user input further comprises evaluating the user input based on the media content use patterns." In addressing these claimed features, the Action asserts that they are described by Wang at col. 5, lines 60-67. Applicant disagrees. Instead, Wang at col. 5, lines 60-67 recites:

> *"The search engine 140 presents the possible answers returned from the FAQ matcher 144 and the keyword searcher 146 to a user. The user is asked to confirm which of the answers best represents the user's intentions in the query. Through this feedback, the search engine may refine the search. Additionally, the search engine may*

use this relevance feedback to train the architecture in its mapping of a parsed query into relevant answers."

This cited portion of Wang is completely silent with respect to the claimed "use patterns" of any type. Nowhere the above-cited portion of Wang explicitly or inherently describe that Wang's "possible answers returned from the FAQ matcher 144 and the keyword searcher 146", the "relevance feedback", the "parsed query", or the "relevant answers" is/are a "media content use patterns", as claim 9 recites. For this additional reason, each and every element of claim 9 is not expressly or inherently described by Wang.

Accordingly, and for this additional reason, to 35 USC 102(b) rejection of claim 9 should be withdrawn.

Claim 24 recites "detecting user input", "responsive to detecting the user input", "analyzing the user input", "predicting desired access to one or more media files based on the analysis", "retrieving information corresponding to one or more media files from a media content source", and "presenting the information as a suggestion." For the reasons already described above with respect to claim 1, Wang does not anticipate these recited features of claim 24.

Accordingly, the 35 USC 102(b) rejection of claim 24 is improper and should be withdrawn.

Claims 25-32 depend from claim 24 and are patentably distinguished over Wang solely by virtue of this dependency. For this reason alone, the 35 USC 102(b) rejections of claims 25-32 are improper and should be withdrawn.

Moreover, claims 25-32 include additional features that are not anticipated by Wang for the reasons already discussed above with respect to claims 4 and 9.

Claim 46 recites "detecting user input", "analyzing the user input", "predicting desired access to one or more media files based on the analysis", "retrieving information corresponding to one or more media files from a media content source", and "presenting the information as a suggestion." For the reasons already described above with respect to claim 1, Wang does not anticipate these recited features of claim 46.

Accordingly, the 35 USC 102(b) rejection of claim 46 is improper and should be withdrawn.

Claims 47-53 depend from claim 46 and are not anticipated by Wang solely by virtue of this dependency. For this reason alone, the 35 USC 102(b) rejections of claims 47-53 are improper and should be withdrawn.

Moreover, claims 47-53 include additional features that are not anticipated by Wang for the reasons already discussed above with respect to claims 4 and 9.

Claim 54 recites "detecting user input", "analyzing the user input", "predicting desired access to one or more media files based on the analysis", "retrieving information corresponding to one or more media files from a media content source", and "presenting the information as a suggestion." For the reasons already described above with respect to claim 1, Wang does not anticipate these recited features of claim 54.

Accordingly, the 35 USC 102(b) rejection of claim 54 is improper and should be withdrawn.

Conclusion

Pending claims 11-9, 24-32, and 46-54 are in condition for allowance and action to that end is respectfully requested. Should any issue remain that prevents

allowance of the application, the Office is encouraged to contact the undersigned prior to issuance of a subsequent Office action.

Respectfully Submitted,

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Respectfully Submitted,